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**DEBTORS HAVE REQUESTED EXPEDITED CONSIDERATION OF THIS  
OBJECTION AND HAS REQUESTED THAT A HEARING BE HELD ON THIS  
OBJECTION AT THE COURT'S EARLIEST CONVENIENCE. IF THE COURT IN  
FACT SETS THIS OBJECTION FOR AN EXPEDITED HEARING, THEN ONLY  
ATTENDANCE AT THE HEARING IS NECESSARY TO PRESERVE YOUR RIGHTS**  
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**TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:**

COME NOW Debtors, Plaintiffs, and Counter-Defendants KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row (collectively the “Debtors”), and submit this Motion Requesting Expedited Consideration of Debtor’s Motion to Compel Discovery Responses to the Debtors’ Written Discovery Requests to DMA Properties, Inc. (“DMA”), Frank Daniel Moore (“Moore”), and Longbranch Energy, LP (“Longbranch”) and the oral testimony of Longbranch (the “Motion”), and in support thereof respectfully shows the Court as follows:

1. This case is presently set for trial on January 11, 2021.
2. DMA, Moore, and Longbranch have engaged in clear instances of discovery abuse including but not limited to violating a court order to withdraw objections, withholding documents, refusing to testify as to non-privileged communications, and making secret deals with non-parties in an effort to conduct a trial by ambush.
3. In an effort to ensure they are adequately prepared for trial, Debtors have filed their Motion to Compel Discovery Responses to the Debtors’ Written Discovery Requests to DMA Properties, Inc., Frank Daniel Moore, and Longbranch Energy, LP. Dkt. No. 190.
4. Debtors now request expedited consideration of their Motion to Compel Discovery Responses to the Debtors’ Written Discovery Requests to DMA Properties, Inc., Frank Daniel Moore, and Longbranch Energy, LP. Having this matter heard before the Court closes for the holidays is vital to ensuring that Debtors have adequate time to prepare for trial.

WHEREFORE PREMISES CONSIDERED, Debtors respectfully request that the Court grant this request and set their Motion to Compel Discovery Responses to the Debtors' Written Discovery Requests to DMA Properties, Inc., Frank Daniel Moore, and Longbranch Energy, LP. to be heard at the Court's earliest convenience.

Dated: December 18, 2020

Respectfully submitted,

MULLER SMEBERG, PLLC

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**CERTIFICATE OF CONFERENCE**

I hereby certify that on December 16, 2020 I conferred with counsel for DMA Properties, Inc. and LongBranch Energy, LP on the record about the expedited request for relief requested in this motion. Upon such conference, counsel has indicated that they are not opposed to the relief requested sought.

/s/ John Muller  
C. John Muller IV

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by way of e-service through the CM/ECF system by notice of electronic filing or via email on the 18th day of December 2020:

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